

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 03CV12247 WGY

MODERN CONTINENTAL )  
CONSTRUCTION, )  
Plaintiff )  
v. )  
RLI INSURANCE COMPANY, )  
Defendant )

**DEFENDANT'S MOTION FOR ADMISSION PRO HAC VICE**

Now comes the local counsel for the defendant and respectfully moves that Attorney Costantino P. Suriano of the law firm of Mound Cotton Wollan & Greengrass, One Battery Park Plaza, New York, NY 10004, be admitted to appear as counsel with the undersigned *pro hac vice* on behalf of the defendant in the above-captioned action. In support of this motion, the undersigned states as follows:

1. Costantino P. Suriano, Esquire has been retained as counsel to represent the interests of the defendant in the above-captioned action;
2. Costantino P. Suriano is admitted to practice before the state courts of New York (since 1981) and New Jersey (since 1992), and he is also admitted to practice before the federal courts in Southern District of New York (since 1981), Eastern District of New York (since 1981), Northern District Court of California (since 1984), U.S. District Court of Appeals, 2<sup>nd</sup> Circuit (since 1989), U.S. Court of Appeals, 7<sup>th</sup> Circuit (since 1990), U.S. District Court, New Jersey District (since 1992), U.S. District Court Western District of New York (since 1993), U.S. District Court of Appeals, 3<sup>rd</sup> Circuit (since 1996), U.S. Court of International Trade (since 1996), U.S. Court of Appeals Federal Circuit (since 1999);

3. Costantino P. Suriano is a member in good standing in all courts referred to in paragraph 2 above;

4. Costantino P. Suriano has previously been admitted to practice *pro hac vice* in courts in Massachusetts, although not in calendar year 2004;

5. The Affidavit of Costantino P. Suriano, attached hereto and made a part hereof, is submitted in furtherance of his motion;

6. Counsel for the plaintiff has stated that he has no objection to this motion for admission *pro hac vice* of Costantino P. Suriano;

7. Costantino P. Suriano, Esquire has expertise in construction related insurance law and has been chosen specifically by the client for his expertise and also based on an existing attorney/client relationship with the defendant.



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